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16 *Attorneys for Plaintiff* MEDIATEK INC.

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
 19 **OAKLAND DIVISION**

20 MEDIATEK INC.

21 Plaintiff,

22 v.

23 FREESCALE SEMICONDUCTOR, INC.

24 Defendant.

Civil Action No. 4:11-cv-05341 (YGR)
 (JSC)

**DECLARATION OF
 MH SHIEH IN SUPPORT OF
 FREESCALE SEMICONDUCTOR
 INC.'S ADMINISTRATIVE MOTION
 TO FILE UNDER SEAL**

DEMAND FOR JURY TRIAL

1 I, MH Shieh, declare as follows:

2 I am an employee of MediaTek Inc. ("MediaTek"), plaintiff in the above-captioned
3 matter. My current job title is Special Assistant to the General Manager. I submit this
4 declaration in support of Freescale Semiconductor Inc.'s ("Freescale") Administrative Motion to
5 File Under Seal Freescale's Letter Brief Regarding Richard Yang's Deposition Testimony
6 ("Administrative Motion") pursuant to Local Rules 7-11 and 79-5. I have personal knowledge of
7 the facts set forth in this declaration and, if called to testify as a witness, could and would do so
8 competently.

9 1. Freescale's Administrative Motion seeks to have filed under seal confidential,
10 unredacted versions of Freescale's Letter Brief Regarding Richard Yang's Deposition Testimony
11 ("Freescale's Letter Brief") and Exhibits 2 and 3 to Freescale's Letter Brief. Freescale's Letter
12 Brief and Exhibits 2 and 3 contain deposition testimony concerning MediaTek's acquisition of
13 the patents-in-suit.

14 2. MediaTek does not publicly disclose information concerning its patent
15 acquisitions. Instead, MediaTek protects this information as a trade secret, and takes steps to
16 ensure that this information remains confidential, including marking the information included as
17 Freescale's Letter Brief and Exhibits 2 and 3 as "HIGHLY CONFIDENTIAL – ATTORNEYS'
18 EYES ONLY" when MediaTek produced this information in this action. If this information
19 were publicly disclosed, MediaTek's competitors could use the information in Freescale's Letter
20 Brief and Exhibits 2 and 3 to MediaTek's economic disadvantage by tailoring their negotiation
21 strategies regarding intellectual property transfers to exploit MediaTek's negotiation practices.

22 3. The requested relief is narrowly tailored to protect the confidentiality of this
23 information. Only those portions of Freescale's Letter Brief and Exhibits 2 and 3 that describe
24 the MediaTek's practices regarding patent acquisitions are covered by Freescale's
25 Administrative Motion.

26 I declare under penalty of perjury under the laws of the United States that the foregoing is
27 true and correct.

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2 Dated: September 6, 2013
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4 Meng-Hann Shieh

5 MH Shieh
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